

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,
LLC, KEY COMMERCIAL
FINANCE PROPERTIES, LLC,
EQUITY PROS, LLC, and MOBILE
AGENCY, LLC

Defendants.

C.A. No. 1:18-cv-01516-CFC

DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT

Defendants Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobile Agency, LLC (collectively, “Defendants”), by and through their undersigned counsel, hereby move for summary judgment against Plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis (“Plaintiff”) pursuant to Rule 56 of the Federal Rules of Civil Procedure. Defendant has filed, simultaneously herewith, an opening brief (the “Opening Brief”) in accordance with D. Del. LR 7.1.3, a Concise Statement of Facts, and an Appendix to Defendants’ Concise Statement of Facts, which are incorporated by reference as if fully set forth herein. Defendants respectfully request the Court enter judgment as a matter of law in favor of Defendants and against Plaintiff with respect to the Verified Complaint filed by Plaintiff.

Dated: August 17, 2020

HALLORAN FARKAS + KITTLA LLP

/s/ Theodore A. Kittila

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